

## {In Archive} Re: PCB --- Keith Egan followup

This message is being viewed in an archive.

Peter Ramanauskas to: Allen Debus

09/16/2011 08:35 AM

Allen,

If you read 761.77(c) beyond the R&D part of that section it goes on to say "or conducting PCB remediation activities". So it could apply.

Personally, I'm fine if he just wants to do it under 61(c). We can still coordinate it with Ohio so everyone is comfortable with what is taking place.

Let me know if you have other questions.

Thanks, Pete

> Allen Debus Mr. Egan - the individual we spoke with two days... 09/15/2011 03:23:10 PM

From: Allen Debus/R5/USEPA/US

Peter Ramanauskas/R5/USEPA/US@EPA To:

Date: 09/15/2011 03:23 PM

PCB --- Keith Egan followup Subject:

Mr. Egan - the individual we spoke with two days ago who had the problem with the vandalized PCB transformer, contents of which leaked into Mill Creek, had a question. If you recall, we did discuss the "coordinated approval" route under 761.77(c) that makes allowances for coordinating with a State Director. However, Mr. Egan's difficulty with this is that it seems to pertain to R&D activities. So he is wondering why it was mentioned. It would seem that he should probably proceed in writing his work plan under 761.61(c)?

He is questioning the applicability of 761.77(c) to his case.

Allen